

400 Seventh Street, S.W. Washington, D.C. 20590

Ref. No.:07-0058

Pipeline and Hazardous Materials Safety Administration

MAR 2 6 2007

Robert Bailey President Approved Fire Protection Company 114 Saint Nicholas Avenue South Plainfield, NJ 07080

Dear Mr. Bailey:

This is in response to your March 9, 2007 letter requesting clarification of the requirements under the Hazardous Materials Regulations (HMR; 49 CFR Parts 100-185) applicable to the visibility and display of placards. Accompanying your letter are photographs of a Ford Econoline cube van with a clearly visible placard mounted on the front of the cargo body. You ask if the van may be placarded on the front portion of the cargo body as depicted in the photos or if it must be placarded on the front grille.

Section 172.516(b) allows the required placarding on the front of the motor vehicle to be displayed on the cargo body or grille, provided the it meets the visibility requirement in § 172.516(a). Therefore, the placarding may be placed on the front of the cargo body as depicted in your photographs.

I hope this information is helpful. Please contact us if you require additional assistance.

Sincerely,

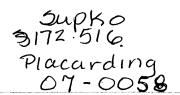
John A. Galé

Chief, Standards Development

Office of Hazardous Materials Standards

070058

172.516



## Jarman, Erin < PHMSA>

From:

Robert Bailey [RBailey@afpnj.com]

Sent:

Friday, March 09, 2007 11:53 AM

To:

INFOCNTR < PHMSA>

Subject:

Request for formal interpretation - Mr. Edward Mazzullo

Attachments: Pictures - truck 030.jpg; Pictures - truck 031.jpg; Pictures - truck 033.jpg; NJSP Examination

Report

Dear Mr. Mazzullo,

The DOT office has directed me to you to request a formal interpretation of the following: Proper placard location for the front of a Ford Econoline cube van.

We have recently been cited by the New Jersey State Police for improper placarding of our cube van. Attached is a copy of the Examination Report along with photos of our truck. Their concern was the placement of the front placard. As you can see by the photos, the front placard is placed on the box portion of the truck directly over the cab. The NJSP stated we should have placed the placard on the front grille area (per 172.504a). We believe the grille area is not the best location since it would be less visible and inhibit air flow for the cooling of the engine. Are we permitted to place the placard on the front portion of the box as shown in the photo?

Thank you in advance for your consideration to this matter,

Robert Bailey President

Approved Fire Protection Company 114 Saint Nicholas Avenue South Plainfield, New Jersey 07080-1808 908-755-2222 Fax: 908-769-1424